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March 26, 2024

By ECF

Honorable Vera M. Scanlon
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Lucy York v. The City of New York et al.*, 22-cv-06432 (OEM)(VS)

Your Honor:

I am a Senior Counsel in the office of the Honorable Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and the attorney for defendants in the above-referenced matter. Defendants write, with plaintiff's consent, to respectfully request a sixty-day extension to all deadlines. The Court previously granted defendants' request for a sixty-day extension on January 31, 2024, as well as, the parties' joint request for a thirty-day extension on January 5, 2024.

Defendants require an extension in order to properly respond to plaintiff's document requests, interrogatories, and requests for admission, which together amount to 137 requests, not including subparts. The undersigned only appeared in this case in January and is still getting up to speed on the factual circumstances and issues to properly investigate and search for responsive information and to properly prepare responses to plaintiff's discovery demands. In addition to the full schedule that I have been juggling over the past three months, that has been heavy with litigation, I was out of the office for five days in March. Defendants also make this request in light of the fact that the undersigned is presently scheduled to be on trial in two other, unrelated, matters, *Rylawn Walker v. City of New York et al.*, 22-cv-05994, beginning on April 15, 2024 before the Honorable Frederic Block and *Garfield Williams v. City of New York et al.*, 20-cv-05995, beginning on May 14, 2024 before the Honorable Lorna G. Schofield. Given the amount of time and preparation necessary, defendants respectfully request that the extension be granted.

Due to these circumstances, defendants respectfully request that the Court-ordered deadlines contained in defendants' January 31, 2024 letter (See Docket No. 24) be adjusted by sixty-days, and respectfully propose the new dates as set forth below:

- Both parties shall cooperate and use best efforts to identify the remaining John Doe Officer on or before April 1, 2024; if Plaintiff believes some document requires expedited production to accomplish this, they may file a motion seeking it after meeting and conferring with Defendants on or before June 3, 2024.
- May 28, 2024:
 - Deadline for Defendants to respond to Plaintiff's First Requests for Admission;
 - Deadline for Defendants to respond to Plaintiff's First Set of Interrogatories and Document Requests; and
 - Deadline for Plaintiff to respond to Defendants First Set of Interrogatories and Request for Production of Documents;
- June 5, 2024:
 - Deadline for Plaintiff to file an amended complaint;
- October 7, 2024:
 - Deadline to complete all fact discovery;
- If Plaintiff is to perform expert discovery, they will serve expert disclosures, pursuant to Fed. R. Civ. Pr. 26(a)(2)(A) by November 6, 2024;
- Plaintiff's Initial expert report will be served by December 6, 2024;
- Defendants' Rebuttal expert report will be served by January 6, 2025;
- All discovery, including expert depositions, will be completed by March 6, 2025, and the parties will file a joint letter on that same date certifying the close of all discovery.

Thank you for your time and consideration of this request.

Respectfully submitted,

Peter Scutero /s
Senior Counsel
Special Federal Litigation Division

cc: ALL COUNSEL (via ECF)